

From: [Darman, Leslie](#)
To: [Bergman, Ronald](#)
Cc: [Green, Holly](#)
Subject: RE: FYI, Gibson Dunn in DC representing the oil companies in California
Date: Thursday, August 21, 2014 9:44:00 AM

Look forward to talking tomorrow at 1. I will be teleworking. I can call your office Ron, or you could call me at **Personal Privacy 6**. We could also use my conference line if you like.

Leslie Darman
U.S. Environmental Protection Agency
Office of General Counsel
Tel: 202-564-5452

From: Bergman, Ronald
Sent: Thursday, August 21, 2014 7:39 AM
To: Darman, Leslie
Cc: Green, Holly
Subject: RE: FYI, Gibson Dunn in DC representing the oil companies in California

Can we try 1:00?

Attorney Client 5

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Because a lot of these wells are dealing with water quality of better than 3,000, we've got a parallel with Region 8's issue.

From: Darman, Leslie
Sent: Wednesday, August 20, 2014 6:29 PM
To: Bergman, Ronald
Cc: Wehling, Carrie; Neugeboren, Steven; Parikh, Pooja
Subject: RE: FYI, Gibson Dunn in DC representing the oil companies in California

Ron – I'm available anytime on Friday except 2:30-4. Carrie is out of the office until Monday. I'm available to talk Thursday, too. In the meantime, here's a summary of what I know from ORC re current

status and next steps:

In the July letter to CA, EPA requested info from the State (under 40 CFR 145.32(d)) about aquifer exemptions to help clear up conflicting records we have as to what aquifers are exempt. Currently, R9 is reviewing the info they've received so far. They are expecting more info in mid-Sept. R9 is having bi-weekly calls with the various CA state agencies.

CA is taking enforcement actions against some oil and gas companies and seeking info from other companies because of concerns about impacts to current sources of drinking water. That effort started before EPA sent the July letter to CA seeking AE info. Apparently, CA initiated the enforcement actions because they found some companies were injecting into USDWs (i.e. without an AE). In other cases CA is looking at as part of this broad enforcement effort, the exemption status is unclear; CA is allowing those operators an opportunity to provide records showing that the aquifer has been exempted.

Leslie Darman
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From: Bergman, Ronald
Sent: Wednesday, August 20, 2014 4:28 PM
To: Wehling, Carrie
Cc: Darman, Leslie
Subject: RE: FYI, Gibson Dunn in DC representing the oil companies in California

We just had a call with Region 9 on the same issue. Are either of you in on Friday to discuss this?

From: Wehling, Carrie
Sent: Wednesday, August 20, 2014 3:27 PM
To: Bergman, Ronald; Darman, Leslie

Cc: Neugeboren, Steven; Parikh, Pooja

Subject: FYI, Gibson Dunn in DC representing the oil companies in California

Attorney Client 5

Attorney Client 5

Thanks.

Carrie

Caroline (Carrie) Wehling
Office of General Counsel
Water Law Office -- SDWA team leader
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U.S. Environmental Protection Agency
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From: Bergman, Ronald
Sent: Wednesday, August 20, 2014 10:37 AM
To: Parikh, Pooja; Wehling, Carrie
Subject: FW: letter going to CA today about UIC program review

[Correspondence with California](#)

From: Albright, David
Sent: Thursday, July 17, 2014 6:28 PM
To: Grevatt, Peter; Stoner, Nancy; Loop, Travis; Feldt, Lisa; Clark, Becki; Bergman, Ronald
Cc: Diamond, Jane
Subject: RE: letter going to CA today about UIC program review

Jane is on the road and asked that I forward the letter and attachments that Jared sent to CA agencies today. They are attached.

Thanks,
David

From: Diamond, Jane

Sent: Thursday, July 17, 2014 11:29 AM

To: Grevatt, Peter; Stoner, Nancy; Loop, Travis; Feldt, Lisa; Clark, Becki

Cc: Montgomery, Michael; Blumenfeld, Jared; Zito, Kelly; Johnson, AudreyL; Albright, David; Dermer, Michele

Subject: letter going to CA today about UIC program review

Deliberative Process 5

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